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To: President Clinton
W. R. Dixon, US DOE ✓

From: Annie Vogel
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1 | I have enclosed my analysis of the US Department of Energy Draft Environmental Impact Statement (DEIS) of the proposed Yucca Mountain Nuclear Waste facility. As a student majoring in premedical sciences combined with science, technology and values, I cannot support this proposal. This DEIS underestimates many of the potentially dangerous health and environmental impacts, which could result from the transportation of nuclear waste to the facility from 77 locations nationwide.

There are many ethical and scientific problems associated with building the repository. The US Department of Energy (DOE) has overlooked the severity of these problems in supporting the DEIS and the building of the site. There have not been enough accurate and thorough studies conducted to insure that the transportation of nuclear waste to this repository could be conducted safely and without detrimental impacts to the surrounding environment.

This is a serious issue and it needs to be treated as one. Please consider the possible dangers associated with transporting hazardous nuclear waste to this facility. Reconsider before the shipments can begin on our highways and through our cities and towns. | Thank you.

Analysis of the Nevada Transportation Components of the Yucca Mountain Draft
Environmental Impact Statement:

Comments on the
Draft Environmental Impact Statement for a Geological Repository for the Disposal of
Spent Nuclear Fuel and High-level Radioactive Waste at Yucca Mountain,
Nye County, Nevada

by

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The Yucca Mountain Repository Site should not be approved since a safe method for transportation of nuclear waste materials to the site has not been determined. In the Environmental Impact Statement (EIS), the DOE has not accurately assessed the potential risk of the proposed transportation methods of either rail or highway. Several factors that must be reconsidered and reevaluated are the frequency and severity of accidents, proposed population growth in the areas near the transportation routes, and a recent increase in traffic speeds. The potential environmental impact resulting from the transportation of waste to the site have also been underestimated in this statement due to incomplete and outdated data. The DOE needs to conduct more accurate and complete studies in order to formulate a more complete assessment of the potential risks. |

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The EIS proposes either rail heavy-haul options for transportation of waste (Moore, 1). However, the DOE does not accurately assess the potential risk or probability of environmental damage or serious accidents resulting from either option. The EIS cited that the frequency of accidents on national interstate highways is not likely to change, despite a recent speed limit increase on these highways, and gives no supporting evidence for its conclusion (Resnikoff, 3). The probability of accidents was also incorrectly calculated to be less than what is actually likely. The DOE does not include the effects of increased highway use in the Las Vegas and surrounding areas as a result of projected population growth. In assessing the potential danger of rail accidents, the DOE uses incomplete data by only assessing the risk resulting from a nuclear fuel falling from a low bridge and does not consider the consequences, which could result from an accident from a tall bridge (Resnikoff, 5). |

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The potential environmental damage, which would result from transportation of the hazardous waste was also underestimated in the EIS. The DOE used incomplete and outdated data to reach an invalid conclusion that the environmental impacts would be minor. The effects on ground and surface water, loss of land use near the site, and the disruption of wild game habitat were underestimated by the DOE (Moore, 22, 20, and 5, respectively). They have not adequately studied the potential impacts either transportation method would have on each of these variables since they did not consider the different measures of impact in a broad enough area (Moore, 22). In order to

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adequately assess the potential damages, the DOE must study the entire area, not only the "area within the right-of-way" (Moore, 20.) The information necessary to make an accurate transportation assessment is missing from the EIS and should be included before any decisions regarding the Yucca Mountain site can be made. Based upon the information from the current EIS, the transportation of hazardous waste to the proposed Yucca Mountain Site should not be conducted. |

Works Cited

Resnikoff, Martin. Cask Safety and related issues in the draft Yucca Mountain EIS.
<http://www.state.nv.us/nucwaste/eis/yucca/rwmaymeis.pdf>. Jan 26, 2000.

Moore, Rick. Rail Issues in the Draft EIS.
<http://www.state.nv.us/nucwaste/eis/yucca/moore1a.pdf>.
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